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December 23, 2024

Via CM/ECF

Hon. Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Freeman v. Giuliani, No. 24-MC-353-LJL (S.D.N.Y.)
Intervenor-Defendant Andrew H. Giuliani's Letter Disclosing Proposed Witnesses

Dear Judge Liman:

Per Your Honor's Order directing the parties to file letters listing proposed witnesses for trial, (Order ¶ 1, ECF No. 184), Intervenor-Defendant Andrew H. Giuliani ("Andrew Giuliani") discloses the following:

Proposed Witness	Topic of Testimony	Time Requested for Direct Exam.
Andrew H. Giuliani	Rudolph W. Giuliani's ("Mayor Giuliani") gift to Andrew Giuliani of four New York Yankees World Series rings—one for each of the Yankees' titles in 1996, 1998, 1999, and 2000, and each engraved with the name "Giuliani" (the "WS Rings")—three of which are included in the personal property at issue in the judgment enforcement proceeding	One hour
Rudolph W. Giuliani	Mayor Giuliani's gift to Andrew Giuliani of the WS Rings	30 minutes
Sean Kalin	Mayor Giuliani's gift to Andrew Giuliani of the WS Rings	15 minutes ¹

¹ The parties have agreed in principle to admitting Sean Kalin's testimony through a sworn declaration, pending a final signature from the witness, who is out of the country during the holidays.

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Andrew Giuliani respectfully asks that the Court allow him to reserve the right to call additional witnesses, either as a result of facts learned in ongoing discovery or to rebut testimony or other evidence offered by Plaintiffs.

Respectfully submitted,

/s/ Scott B. McBride
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